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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHOSH YONAY, an individual, and
YUVAL YONAY, an individual,

Plaintiffs,

v.

PARAMOUNT PICTURES
CORPORATION, a Delaware
corporation.

Defendant.

Case No. 2:22-CV-3846-PA-GJS

**JOINT STIPULATION
REGARDING MODIFICATION
OF HEARING DATE**

District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish

STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“PPC”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, on October 18, 2023, the Court entered an order modifying the filing and hearing dates for motions for summary judgment and to exclude experts;

8 **WHEREAS**, under the current Schedule of Trial and Pretrial Dates, *see*
9 October 18, 2023 Minute Order (ECF No. 49), the date set for hearing the
10 Parties' cross motions for summary judgment and to exclude experts is January
11 8, 2024, at 1:30 p.m.;

12 **WHEREAS**, Plaintiffs have filed a motion to strike, which is also set for
13 hearing on January 8, 2024, at 1:30 p.m.;

14 **WHEREAS**, Plaintiffs' lead counsel, Marc Toberoff, will be in British
15 Columbia, Canada with his family for the holidays and will not return to Los
16 Angeles until late on January 8, 2024;

17 **WHEREAS**, in light of Mr. Toberoff's travel plans, Plaintiffs have asked
18 PPC to agree to continue the hearing date on the Parties' motions for summary
19 judgment and to exclude experts and on Plaintiffs' motion to strike, subject to
20 the Court's approval;

21 **WHEREAS**, to accommodate Plaintiffs, PPC has advised Plaintiffs that
22 PPC will not oppose a short continuance, provided (1) the continuance is to the
23 afternoon of January 11 or any time on January 12 (as counsel for PPC has
24 preexisting conflicts on January 9,10, and the morning of January 11), subject to
25 the Court’s willingness to hear the motions then:¹ and (2) the briefing schedule

²⁷ 1 The following Monday, January 15, 2024, is a federal holiday. PPC does not agree to
28 a two-week extension of the hearing date. PPC is eager for a ruling on its motion for
summary judgment, and any further delay would significantly impact the Parties' time

1 remains the same on the motion to strike;

2 **WHEREAS**, this modification will not meaningfully delay the overall
3 progress of the case.

4 Based on the foregoing, **IT IS HEREBY STIPULATED** by and between
5 the Parties, through their respective counsel of record, subject to the Court's
6 approval, that:

7 1. The hearing date for the Parties' motions for summary judgment
8 and to exclude experts, and for Plaintiffs' motion to strike, is continued to the
9 afternoon of January 11 or 12, at the Court's choosing.

10 2. Notwithstanding any change in the hearing date, Plaintiffs' current
11 December 22, 2023 reply deadline in support of their motion to strike shall
12 remain unchanged.

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28 to complete damages discovery in the event that the case remains active following the
Court's resolution of the Parties' cross-motions for summary judgment.

1 Date: December 19, 2023

TOBEROFF & ASSOCIATES, P.C.

2 By: /s/ Marc Toberoff
3 Marc Toberoff

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8 *Attorneys for Plaintiffs*

9

10 Date: December 19, 2023

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SIGNATURE ATTESTATION

Pursuant to CACD Local Rule 5-4.3.4(a)(2)(i), I certify that I have obtained authorization to file this document from the other signatories to this document and that all other signatories have authorized placement of their electronic signature on this document.

Date: December 19, 2023

TOBEROFF & ASSOCIATES, P.C.

By: _____ /s/ *Marc Toberoff*
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